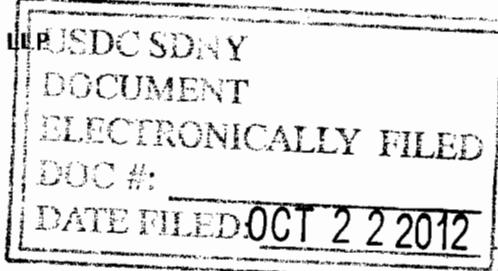


BAKER BOTTS

October 15, 2012

BY FACSIMILE

The Honorable Laura Taylor Swain
United States District Court for the
Southern District of New York

Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Courtroom 11C
New York, New York 10007

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Re: Williamson v. Verizon Communications Inc. et al., Case No. 1:11-cv-04948 (LTS)

Dear Judge Swain:

We represent Defendants AT&T, Inc., AT&T Operations, Inc., and AT&T Services, Inc. ("AT&T") in the above-referenced action, and jointly write to request permission to file confidential documents under seal with the Verizon Defendants. No protective order has yet been entered in this case, though the parties are actively preparing and conferring on a form of stipulated protective order to be submitted for the Court's consideration.

Defendants are filing a motion for spoliation sanctions on October 16, 2012. The memorandum of law and certain exhibits Defendants seek to submit in support have been designated Confidential Information. We respectfully request that the Court enter an Order permitting Defendants to file their brief and exhibits under seal.

Defendants have good cause for this request because the memorandum of law and exhibits contain information that has designated confidential. Defendants have conferred with counsel for Plaintiff in good faith and Plaintiff does not oppose this request for under seal filing.

Respectfully submitted,

Richard Harper

RH:jpm

The request is granted. redacted copies must be filed on the ECF system.

cc: All Counsel of Record (via email)

SO ORDERED.

NEW YORK, NY

Oct 18 2012

Laura Taylor Swain

U.S. DISTRICT JUDGE